



Jason A Jensen <jason.jensen@temperedenterprises.com>

RECORDS REQUEST: JAJ-04062019-00001

Jason A Jensen <jason.jensen@temperedenterprises.com>

Tue, Oct 15, 2019 at 11:36 AM

To: Liz Palau <LPalau@cityofhomestead.com>, Elizabeth Sewell <ESewell@cityofhomestead.com>, Matt Mandel <MMandel@wsh-law.com>, "Samuel I. Zeskind" <szeskind@wsh-law.com>, Julissa Chavez <JChavez@cityofhomestead.com>

Bcc: Eric McDonough <phd2b05@gmail.com>

So to stop beating around the bush here.. attached are the two files modified to hide and highlight the related records.

So, between April and October - I happen to know, for a fact, the City signed and submitted an Affidavit stating that the reason Eric McDonough's PRR was handled on 3/11 was because PRR are processed in the order they are received - and it wasn't an attempt to delay Dr McDonough in receipt of the records he requested. I also happen to know for a fact, my Excel skills and my records requests, documented that those statements were never true. Now those records have been modified, in a quite expert way as Excel usually has no way of tracking changes like this.

However, the City is required to have data retention plans which, in a matter of due diligence, must have a backup system. I hereby request all records pertaining to all those backup systems and every "version" or "copy" of this record request log in the city's possession.

[Quoted text hidden]

2 attachments



Public Records Log April - Highlighted Changes and related Records.pdf

69K



Public Records Log October - Highlighted Changes and related Records.pdf

250K

Date Received	Date on PRR	REQUESTED BY	TYPE OF REQUEST Non-certified photocopies of the following:	DATE & DEPARTMENT FORWARDED TO	DATE COMPLETED
2/19/2019	2/18/2019	DR. JAMES ERIC McDONOUGH	Requesting all records, documents, leave slips, etc. ad infinitum related to any leave taken by Murguido between April 9th, 2013 and April 9th 2015. This includes sick leave, vacation leave, holiday leave, administrative leave and comp time. Also including any leave or travel for training or any other official reason.	Rec'd by HPD directly	Records Provided on 3/11/2019, 3/15/2019, 3/21/2019 and 3/26/2019
2/26/2019	7/26/2019	DAIMELYS PAZ (RUBENSTEIN LAW)	No.:19000290, Date of accident: 1/10/2019, Case No.: 1901170023, Date of	HPD.	3/10/2019 - Sunday
2/26/2019	2/22/2019	TORRES LLP) - JAMI TOTI INCIDENT	Request a copy of the incident report for the Case No. 17-0518-0017.	Rec'd by HPD directly	3/10/2019 - Sunday
2/25/2019	2/20/2019	AARON E HARRELL	FOOTAGE)	Rec'd by HPD directly	3/10/2019 - Sunday

Date Received	REQUESTED BY	TYPE OF REQUEST	DATE COMPLETED	DATE PICKED UP, EMAILED AND/OR MAILED
2/15/2019	APD MILNES def. WILFRED JEAN-BAPTISTE	Request for non-certified photocopies of Case File F18017216	Rec'd by HPD directly	3/10/2019 - Sunday. RCVD Records (Pending PMT) 4/3/2019 - Payment RCVD
2/19/2019	James Eric McDonough	Requesting all records, documents, leave slips, etc. ad infinitum related to any leave taken by Murguido between April 9th, 2013 and April 9th 2015. This includes sick leave, vacation leave, holiday leave, administrative leave and comp time. Also including any leave or travel for training or any other official reason.	Rec'd by HPD directly	3/10/2019 - Sunday
2/21/2019	LO FOX ROTHSCHILD re ROBLERO	Request for all police reports, incident reports, investigation reports, offense reports, special investigation unit reports, photographs, videos, witness statements (written and recorded) diagrams, charts, etc.	Rec'd by HPD directly	3/10/2019 - Sunday (Pending Inv Pmt) 4/3/2019 - Payment RCDV
2/26/2019	DAIMELYS PAZ (RUBENSTEIN LAW)	Request for Case No.:1901240009, Date of accident: 1/24/2019, Case No.:19000290, Date of accident: 1/10/2019, Case No.: 1901170023, Date of accident: 1/17/2019. Include: 911 Tape Recordings	Rec'd by City Clerk sent to HPD.	3/10/2019 - Sunday
2/26/2019	DENNIS FUENTES (KASOWITZ, BENSON, TORRES LLP) - JAMI TOTI INCIDENT	Request a copy of the incident report for the Case No. 17-0518-0017.	Rec'd by HPD directly	3/10/2019 - Sunday
2/25/2019	AARON E HARRELL	INCIDENT CONCERNING A 4 YEAR OLD ON JAN 31, 2019 (VIDEO FOOTAGE)	Rec'd by HPD directly	3/10/2019 - Sunday